

**Marie-Ann Greenberg, MAG-1284**  
**Marie-Ann Greenberg, Standing Trustee**  
**30 TWO BRIDGES ROAD**  
**SUITE 330**  
**FAIRFIELD, NJ 07004-1550**  
**973-227-2840**  
**Chapter 13 Standing Trustee**

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**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF NEW JERSEY**

IN RE:

WARREN P. GREEN

**Case No.: 22-19197JKS**

**HEARING DATE: 06/22/2023 at 10:00 AM**

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**TRUSTEE'S LIMITED OBJECTION TO DEBTOR(S) MOTION TO SELL PROPERTY**

Marie-Ann Greenberg, the Chapter 13 Standing Trustee by way of limited objection to the Debtor(s) Motion to Sell Property, respectfully objects as follows:

- This case has not yet been confirmed but a confirmation hearing is set for June 8, 2023 in which a 100% plan is contemplated. Pursuant to the Chapter 13 plan assets of the estate do not vest until confirmation so this motion is predicated on that plan being confirmed. Further, there is no proposed form of order attached to this motion? Typically a motion for sale also has an order for the parties to review. Finally, the certification of debtor's counsel provides little insight into the transaction for sale. The third circuit requires that a property is sold to an unrelated/non-insider and that the purchase is for value. Neither of these requirements have been addressed by this motion.

It is for these reasons and any others the Court deems fit that the Motion to Sell be denied.

Dated: May 26, 2023

By: /S/Marie-Ann Greenberg  
Marie-Ann Greenberg, Esquire  
Chapter 13 Standing Trustee